



United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

March 17, 2020

BY ECF AND EMAIL

The Honorable Ronnie Abrams
United States District Judge
Southern District of New York
Thurgood Marshall U.S. Courthouse
40 Foley Square
New York, New York 10007

Re: *United States v. Joel Pena, 18 Cr. 640 (RA)*

Dear Judge Abrams:

The parties in the above-captioned case respectfully and jointly submit this adjournment request in light of Standing Order M10-468 (*In re: Coronavirus/COVID-19 Pandemic*), issued March 13, 2020.

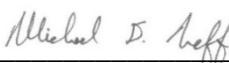
The parties have conferred regarding the anticipated change-of-plea hearing, currently scheduled for Tuesday, March 24, 2020. If it is acceptable to the Court, the parties jointly request an approximately 30-day adjournment. By way of context, the Government issued a plea offer approximately two weeks ago, but defense counsel needs to review that plea offer with the defendant—a process hindered by the MCC lockdown at first, and now the ongoing pandemic. (The defendant is housed at the MCC.) The parties note that, if this adjournment request is granted, time appears to be excluded under the Speedy Trial Act pursuant to Standing Order M10-468, ¶ 8. Such an exclusion is independently merited, as well—and consented to by the defense—as the requested adjournment will permit the defense to review a formal plea offer with the defendant. *See* 18 U.S.C. § 3161(h)(7)(A).


Ronnie Abrams
United States District Judge March 17, 2020

Respectfully submitted,

GEOFFREY S. BERMAN
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Southern District of New York

By:


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cc: William J. Stampur, Esq. (by ECF and email)